

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

BIJU MUKRUKKATTU JOSEPH, *et al.*,

Plaintiffs,

v.

SIGNAL INTERNATIONAL L.L.C., *et al.*,

Defendants.

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CIV. NO. 1:13-cv-00324-RC-ZJH

**PLAINTIFFS' UNOPPOSED MOTION FOR ENTRY OF CONSENT ORDERS
REGARDING DISCOVERY**

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Plaintiffs Biju Mukrukkattu Joseph, et al., file this unopposed motion for entry of four proposed consent orders related to discovery issues. In order to save ESI processing and hosting costs, Plaintiffs expressed a desire to share a database hosting ESI produced by the Signal Defendants in the Related E.D. La. Cases¹. In addition, Plaintiffs expressed a desire to streamline discovery. Plaintiffs' counsel in the Related E.D. La. Cases first requested Defendant Signal consent to the Plaintiffs in the Related Cases², including Plaintiffs here, sharing of a common ESI database. Through a series of correspondence, meet and confer telephonic conferences, and participation in a Status Conference in the Related E.D. La. Cases, Defendant Signal identified certain parameters it believed were necessary to allow sharing of the ESI produced in the Related E.D. La. Cases. Defendant Signal and counsel for plaintiffs in the *Samuel* case subsequently negotiated four proposed consent orders to facilitate the streamlining of discovery in the instant action and the Related Cases. As in *Samuel*, Discovery is scheduled to close in this case on July 25, 2014. The attached proposed orders are the same as those entered in *Samuel*, modified only to include *Samuel* rather than this case as a related case.

Counsel for Plaintiffs has made attempts to consult with counsel for the Signal Defendants, the Dewan Defendants and the Burnett Defendants regarding these proposed orders. Counsel for Plaintiffs have had earlier correspondence with counsel for Signal Defendants,

¹ The Related E.D. La. Cases refers to *David, et al. v. Signal Int'l, LLC, et al.*, No. 08-1220 (SM/DEK) (E.D. La.); *Achari, et al. v. Signal Int'l, LLC, et al.*, No. 13-6218 (SM/DEK) (E.D. La.); *Chakkiyattil, et al. v. Signal Int'l, LLC, et al.*, No. 13-6219 (SM/DEK) (E.D. La.); *Krishnakutty, et al. v. Signal Int'l, LLC, et al.*, No. 13-6220 (SM/DEK) (E.D. La.); *Devassy, et al. v. Signal Int'l, LLC, et al.*, No. 13-6221 (SM/DEK) (E.D. La.); *Singh, et al. v. Signal Int'l, LLC, et al.*, No. 14-732 (ILRL-SS) (E.D. La.) and *EEOC v. Signal Int'l, LLC, et al.*, 12-00557 (SM/DEK) (E.D. La.).

² The Related Cases refers collectively to the Related E.D. La. Cases, as well as *Samuel, et al. v. Signal Int'l, LLC, et al.*, No. 13-CV-00324-RC-ZHI (E.D. Tex.); *Meganathan, et al. v. Signal Int'l, LLC, et al.*, No. 1:13-cv-00497-MAC-ZJH (E.D. Tex.); *Kambala, et al. v. Signal Int'l, LLC, et al.*, No. 1:13-cv-00498-RC-ZJH (E.D. Tex.); and *Marimuthu, et al. v. Signal Int'l, LLC, et al.*, No. 1:13-cv-00499-MAC-ZJH (E.D. Tex.)

Burnett Defendants and Dewan Defendants about the concepts. Counsel for *Joseph* Plaintiffs were copied on correspondence of the negotiations between counsel for the *Samuel* Plaintiffs and counsel for the Defendants leading to the essentially identical orders entered in *Samuel* on May 30, 2014. Counsel for Plaintiffs have transmitted the proposed orders to each counsel for Defendants via email on June 2, 2014 and again on June 3, 2014. Counsel for Plaintiffs have only received a response from the counsel for Dewan Defendants who do not oppose. The Dewan Defendants and the Burnett Defendants have already been served with the Signal Defendants' ESI which is the subject of the Consent Order Regarding Protocols for the Production of Electronically Stored Information, and thus it does not apply to them.

Plaintiffs therefore request that the court enter the Consent Order Regarding Protocols for the Production of Electronically Stored Information, the Consent Supplemental Protective Order, the Consent Clawback Order, and the Consent Order Regarding Use of Discovery from Related Cases.

DATED: June 9, 2014

[signatures on next page]

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CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2014, I electronically filed the foregoing **Plaintiffs' Unopposed Motion for Entry of Consent Orders Regarding Discovery** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all CM/ECF participants.

I further certify that on June 9, 2014, I served a true and correct copy of the foregoing document upon the below-named Defendants by depositing a copy of same in the U.S. Mail, with sufficient postage thereon to insure delivery, and properly addressed as follows:

Michael Pol
Global Resources, Inc.
c/o William P. Wessler, Esq.
William P. Wessler, Attorney at Law
1624 24th Avenue
Gulfport, MS 39501-2969

Mr. Billy Wilks
9136 Heather Lane
Moss Point, MS 39562

I further certify that on June 9, 2014, I served a true and correct copy of the foregoing document upon the below-named Defendants by forwarding a copy to them via international mail, with sufficient postage thereon to insure delivery, and properly addressed as follows:

Indo-Ameri Soft L.L.C.
Vijaya Roa (Register Agent)
c/o Kurello Rao
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Dangriga, Stann Creek Dist., Belize

Kurella Rao
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/s/ Daniella D. Landers
Daniella D. Landers

CERTIFICATE OF CONFERENCE

The undersigned Counsel certifies that Counsel has complied with the meet and confer requirement in Local Rule CV-7(h), by conferring by telephone on April 28, 2014 and May 6, 2014 and via e-mail and letter correspondence on numerous occasions in May and June 2014 with counsel for Signal International L.L.C., Signal International, Inc., Signal International Texas, G.P., and Signal International Texas, L.P. (collectively “Signal Defendants”), and via e-mail with counsels for Defendants Sachin Dewan and Dewan Consultants Pvt. Ltd., (collectively “Dewan Defendants”) and Defendants Malvern C. Burnett, The Law Offices of Malvern C. Burnett, A.P.C., and Gulf Coast Immigration Law Center, LLC (collectively “Burnett Defendants”) concerning the nature of this Motion and the requested relief. All counsel contacted indicated they do not oppose the consent orders requested.

/s/ Daniella D. Landers
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